

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

CHARLES H. TIGNER, IV,

Plaintiff,

v.

Case No. 21-2475-MSN-tmp

CITY OF MEMPHIS, *et al.*

Defendants.

MOTION TO LIFT THE ADMINISTRATIVE STAY

COMES NOW Defendant Officer Kyle J. Lampley, in his individual capacity, through counsel, and respectfully moves this Court to lift the administrative stay and restore the case to the active docket of the Court. In support of this Motion, Officer Lampley would submit the following:

1. On July 18, 2024, Officer Lampley filed his Motion for Stay Pursuant to Servicemembers' Civil Relief Act. (DE # 128).
2. On July 22, 2024, the Court granted that Motion to Stay and under separate Order closed the case until December 15, 2024. (DE # 130).
3. As of December 9, 2024, Officer Lampley hereby advises that his period of mobilization has terminated. As such, lifting the administrative closure of this case is proper.
4. Counsel for Plaintiff and counsel for the City of Memphis have been consulted and do not oppose this Motion.

As such, Officer Lampley respectfully moves this Court to issue an Order lifting the stay and allow the parties to proceed.

Respectfully Submitted,

s/ Mary Elizabeth McKinney

MARY ELIZABETH MCKINNEY, Bar No. 21597

Attorney for Defendant Officers Individually

GODWIN, MORRIS, LAURENZI

& BLOOMFIELD, P.C.

50 North Front Street, Suite 800

Memphis, TN 38103

(901) 528-1702

bmckinney@gmlblaw.com

CERTIFICATE OF CONSULTATION

I, Mary Elizabeth McKinney, counsel to Defendant Officers individually, hereby certify that on December 13, 2024, I did contact Plaintiff's counsel and counsel to Defendant City of Memphis via email. Counsel indicated they do not oppose the relief requested.

s/ Mary Elizabeth McKinney

MARY ELIZABETH MCKINNEY

CERTIFICATE OF SERVICE

I, Mary Elizabeth McKinney, hereby certify that on December 13, 2024, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system and that upon filing notice will be sent via the Court's CM/ECF system to all registered parties.

s/Mary Elizabeth McKinney

MARY ELIZABETH MCKINNEY